

MELINDA HAAG (CABN 132612)
United States Attorney

J. DOUGLAS WILSON (DCBN 412811)
Chief, Criminal Division

THOMAS MOORE (ALBN 4305-O78T)
Assistant United States Attorney
Chief, Tax Division

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7017
FAX: (415) 436-7009

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 14-00092 JST
)	
Plaintiff,)	STIPULATION TO SCHEDULE STATUS
)	CONFERENCE AND TO EXCLUDE TIME
v.)	UNDER SPEEDY TRIAL ACT AND PROPOSED
)	<u>ORDER THEREON</u>
ROBERT DOYLE,)	
)	
Defendant.)	
)	

For the reason that defendant's counsel requires reasonable time for effective preparation of counsel, to prepare this material for trial, and to prepare witnesses for trial, it is hereby stipulated by and between Plaintiff, the United States of America, and Defendant, Robert Doyle, through their respective counsel, as follows:

1. That a status conference in this matter be scheduled for June 6, 2014, at 9:30 a.m.; and
2. That the period of delay from April 11, 2014, to June 6, 2014, shall be excluded pursuant to 18 U. S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv) as the ends of justice served by this exclusion allowing for continuity of counsel, ongoing discovery production and review, and for adequate trial preparation in this matter outweigh the best interest of the public and the Defendant in a speedy trial.

Respectfully Submitted,

MELINDA HAAG
United States Attorney

/s/
JOYCE LEAVITT
Federal Public Defender
Attorney for Robert Doyle

/s/
THOMAS MOORE
Assistant United States Attorney
Chief, Tax Division

For the reasons stated by the parties in their stipulation, Court finds that the ends of justice served by continuing the trial of this matter outweigh the best interest of the public and the Defendant in a speedy trial because additional time is required to allow for continuity of counsel and to allow Defendant's counsel adequate time to review the government's discovery; to prepare this matter for trial; and prepare witnesses for trial.

IT IS ORDERED a status conference be held on June 6, 2014, at 9:30 a.m., that the period of delay from April 11, 2014, through June 6, 2014, shall be excluded in accordance with the provisions for the Speedy Trial Act, 18 U.S.C. § § 3161(h)(7)(A) and (h)(7)(B)(iv), as the ends of justice served by this continuance allowing for continuity of counsel and for adequate preparation outweigh the best interest of the public and the Defendant in a speedy trial.

Dated: April 16, 2014


HON. JON S. TIGAR
UNITED STATES DISTRICT JUDGE